



**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FRENKEL LAMBERT WEISS WEISMAN &  
GORDON, LLP**  
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Sean O'Brien, Esq.  
Attorneys for Secured Creditor U.S. Bank, NA

Order Filed on July 9, 2018  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

In Re:  
Lisa M. Pyper and Shaun M. Pyper,  
  
Debtors,

Case No.: 15-14297-VFP

Chapter 13

Honorable Vincent F. Papalia

**CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM AUTOMATIC STAY**

The relief set forth on the following pages numbered two (2) through five (5) is hereby  
ORDERED.

**DATED: July 9, 2018**

  
Honorable Vincent F. Papalia  
United States Bankruptcy Judge

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Debtors: Lisa M. Pyper and Shaun M. Pyper

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Secured Creditor U.S. Bank, N.A., as trustee for the holders of the MASTR Asset Backed Securities Trust 2006-WMC3 Mortgage Pass-Through Certificates, Series 2006-WMC3 (the "Secured Creditor"), having filed a Motion for Relief from Stay (the "Motion") regarding the real property located at 35 Warren Road, Sparta, New Jersey 07871 (the "Property") currently owned by Debtors Lisa M. Pyper and Shaun M. Pyper, the Chapter 13 Debtors in the above proceeding (the "Debtors"), and it appearing that Secured Creditor and the Debtors have resolved the issues in the Motion upon the terms set forth herein, and upon the mutual consent of Secured Creditor and the Debtors, and no further notice need be given, and good and sufficient cause appearing for the entry of the within Consent Order, it is hereby ORDERED AS FOLLOWS:

1. Debtors have cured the postpetition arrears and are currently due for the June 1, 2018 payment.

2. Debtors shall remain current on their regular monthly mortgage payments to Secured Creditor beginning with the payment due June 1, 2018 and continuing forward.

3. The Debtors shall be in default of this agreement if Debtors fail to stay current with their regular contractual mortgage payments going forward for more than thirty (30) days past the date payment is due. It is the Debtor's responsibility to ensure that funds are available for all payments made as payments that fail to be made or that fail to clear due to insufficient funds will constitute default in accordance with the terms of the Consent Order. Upon the

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day of said default, Secured Creditor may seek any and all remedies afforded to it under the law including but not limited to submitting a Certification to the Court on notice to Debtor and Debtor's counsel that Debtor has defaulted on the terms of this Consent Order and requesting relief from the automatic stay.

4. The terms of this Consent Order shall be incorporated by reference into any plan or plans filed, amended, and confirmed in the Debtor's within case or any subsequent case filed under the Bankruptcy Code (the "Code"), and no such plan may be confirmed that is inconsistent with the terms of this Consent Order.

5. The parties to this Consent Order, and anyone who succeeds to their rights and responsibilities hereunder, their successors and assigns, are bound by this Consent Order. This Consent Order is for the benefit of the named parties and all who succeed to their rights and responsibilities.

6. This Consent Order reflects and constitutes the entire understanding and agreement between the consenting parties respecting this matter. No changes, alterations, modifications, or qualifications to the terms stated here shall be made binding unless made in writing and signed by the parties to this Consent Order.

7. No delay or failure by either party to exercise any right hereunder, and no partial or single exercise of any such right, shall constitute a waiver of that or any other rights, unless otherwise expressly provided herein.

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8. This Consent Order shall be governed by and construed in accordance with the laws of the State of New Jersey, without giving effect to principles of conflicts of laws, and any and all disputes under and related to this Consent Order shall be exclusively within the jurisdiction of the United States Bankruptcy Court for the District of New Jersey or an appellate court thereof and, failing such jurisdiction, within the courts of the State of New Jersey.

9. If any of the provisions of this Consent Order shall be later held to be invalid or unenforceable according to law, the remaining provisions herein shall not be affected thereby and shall continue in full force and effect only to the extent the intent of the parties to this Consent Order can be fully carried out.

10. The parties to this Consent Order agree and acknowledge that this is a negotiated Consent Order and that the rule of construction that any ambiguities be construed against the drafting party shall not apply.

11. The parties understand and agree to the terms of this Consent Order. By signing this Consent Order, the parties acknowledge and agree that they have duly considered, approved, and authorized this Consent Order, and have taken all necessary actions for it to be valid and binding. The parties further acknowledge that the individual, officer, agent, representative, or employee signing this Consent Order has the express authority to do so; has been afforded a reasonable and sufficient period of time to review the terms thereof; and has signed it both freely and voluntarily and without duress or coercion and with full knowledge that the only consideration for signing this Consent Order are the terms stated herein, and no other promise, agreement, or representation of any kind has been made to any person to cause such individual,

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officer, agent, representative, or employee signing this Consent Order to execute same.

Law Offices of James C. Zimmerman  
Attorneys for Chapter 13 Debtors

James C. Zimmermann, Esq.  
244 Route 94, Suite 1  
Vernon, NJ 07462

Dated: July , 2018

Frenkel Lambert Weiss Weisman & Gordon LLP  
Attorneys for Secured Creditor

Sean O'Brien, Esq.  
80 Main Street, Suite 460  
West Orange, NJ 07052

Dated: July 6, 2018

**Certificate of Notice Page 6 of 6**  
**United States Bankruptcy Court**  
**District of New Jersey**

In re:  
 Shaun M Pyper  
 Lisa M Pyper  
 Debtors

Case No. 15-14297-VFP  
 Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0312-2

User: admin  
 Form ID: pdf903

Page 1 of 1  
 Total Noticed: 1

Date Rcvd: Jul 10, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 12, 2018.

db/jdb +Shaun M Pyper, Lisa M Pyper, 35 Warren Road, Sparta, NJ 07871-2720

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
 NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jul 12, 2018

Signature: /s/Joseph Speetjens

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 10, 2018 at the address(es) listed below:

Andrew M. Lubin on behalf of Creditor U.S. Bank National Association, as Trustee for MASTR Asset Backed Securities Trust 2006-WMC3, Mortgage Pass-Through Certificates, Series 2006-WMC3 bkecf@milsteadlaw.com, alubin@milsteadlaw.com  
 Denise E. Carlon on behalf of Creditor U.S. Bank National Association, as Trustee for MASTR Asset Backed Securities Trust 2006-WMC3, Mortgage Pass-Through Certificates, Series 2006-WMC3 dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com  
 Denise E. Carlon on behalf of Creditor U.S. Bank National Association, as Trustee for MASTR Asset Backed Securities Trust 2006-WMC3, Mortgage Pass-Through Certificates, Series 2006-WMC3 dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com  
 James C. Zimmermann on behalf of Debtor Shaun M Pyper jim@jzlawyer.com, jim@jzlawyer.com  
 James C. Zimmermann on behalf of Joint Debtor Lisa M Pyper jim@jzlawyer.com, jim@jzlawyer.com  
 Marie-Ann Greenberg magecf@magtrustee.com  
 Rebecca Ann Solarz on behalf of Creditor U.S. Bank National Association, as Trustee for MASTR Asset Backed Securities Trust 2006-WMC3, Mortgage Pass-Through Certificates, Series 2006-WMC3 rsolarz@kmllawgroup.com  
 Sean M. O'Brien on behalf of Creditor U.S. Bank National Association, as Trustee for MASTR Asset Backed Securities Trust 2006-WMC3, Mortgage Pass-Through Certificates, Series 2006-WMC3 sobrien@flwlaw.com

TOTAL: 8